

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

DOCKET NO. D.T.E. 98-52

RESPONSE OF COMPLAINANTS TO MECO-23

MECO-23                      Please provide sag and tension information for each of the complainants' standard cable bundle configurations. This should include standard messengers and typical bundles of attached cables. At a minimum, this information should cover sags and corresponding tension information for spans of 150' and 200', with wire conditions of: (1) 120 F, (2) its maximum operating temperature and (3) 32 F with 1/2" radial ice.

RESPONSE:                      Complainants object to this information request on grounds of relevance. Both the Complainants and the Respondent have used 18 feet as the lowest line attachment in their respective rate calculations. Without waiving their objection, the Complainants state that the lowest user on joint use poles is Bell Atlantic, not cable operators. Cable operators attach 12" above Bell Atlantic. Complainants understand that Bell Atlantic uses a 10M strand with very little sag.

Date: July 27, 1998

Responsible Witness: Counsel (as to objection)/Paul Glist

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RESPONSE OF COMPLAINANTS TO MECO-25

MECO-25                      Referring to the testimony of Mr. Glist, page 5, lines 1-3: Please provide proof that “aerial cable television facilities...do not change the characteristics of the pole to which they attach”.

RESPONSE: The poles installed by MECo for the attachment of MECo facilities and Bell Atlantic facilities would not differ from the poles installed by MECo for the additional attachment of cable lines. If additional height is required, cable pays for the replacement of the pole, pursuant to the three way pole agreements.

Date: July 27, 1998

Responsible Witness: Counsel (as to objection)/Paul Glist

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RESPONSE OF COMPLAINANTS TO MECO-26

MECO-26                      Please provide a copy of the guidance letter referred to by Mr. Glist on  
page 18,  
line 18 of his testimony.

RESPONSE: This document has been submitted by MECo in its direct case. See, DMW-2.

Date: July 27, 1998

Responsible Witness: Paul Glist



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RESPONSE OF COMPLAINANTS TO DTE-CABLE1-1

DTE-CABLE 1-1      In light of Department precedent in D.T.E. 97-82, please explain why Complainants use an amount from FERC Form 1 page 200, line 13 for total electric plant instead of from page 200, line 3.

RESPONSE:            Mr. Glist was the witness who presented A-R Cable Services, Inc. et als' calculation of Boston Edison's pole rate in the *A-R Cable Services* case, D.P.U./D.T.E. 97-82. It is customary in FCC pole rate cases that a party may accept a carrying charge entry offered by the other to narrow disputes. Boston Edison had utilized the gross plant investment at page 200, line 3 of its FERC Form 1, and Mr. Glist used the same entry. The default entry used by the FCC is "gross plant investment, p.200, line 7, col. b," under CC Docket 86-212 (1987) (on today's FERC Form 1, what was referred to as line 7 is now at line 8). Thus, Boston Edison's calculated rate is slightly higher than had it used the FCC default entry. But for the desire to reduce the large number of disputed issues with Boston Edison, Mr. Glist would have used the FCC default in that case as well as in this case.

In this case, Respondent developed its proposed rate by using gross plant investment at p.200, line 13. Mr. Glist was familiar with many FCC pole rate calculations using this entry, such as *Group W Cable v. Northern States Power*, PA 82-0075, *Mimeo* 5939 (August 16, 1983). He therefore accepted the carrying charge entry in order to reduce the number of issues in dispute in this case.

As noted above, the default entry used by the FCC where the parties cannot agree is gross plant investment, p.200, line 7[8]. If that figure (\$1,578,152) were used, the rates recommended by Mr. Glist would change from \$9.08/\$4.54 to \$9.13/\$4.56.

Date: July 27, 1998

Responsible Witness: Paul Glist

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RESPONSE OF COMPLAINANTS TO DTE-CABLE1-2

DTE-CABLE1-2      In light of Department precedent in D.T.E.97-82, please explain why the Complainants use FERC Accounts 190 and 283 in their calculation of accumulated deferred taxes for total electric plant instead of Accounts 281 and 282.

RESPONSE:      Mr. Glist's view is that the most appropriate accounting for accumulated deferred taxes for poles is to apportion Account 282 by assets, which remains the customary and most prevalent method. Mr. Glist testified to this effect in the *A-R Cable Services* case, D.P.U./D.T.E. 97-82. However, in the *A-R Cable Services* case, Boston Edison requested, and the Department held, that Account 281 should also be included. In this case, Respondent requested use of two additional accounts (accounts 190 and 283) and one adjustment. Mr. Glist was seeking to adjust his approach to what he believed was the Department's expansion of the accounts to use. He therefore reviewed past FCC orders to find if there was any basis for adding the adjustments sought by the Respondent. Mr. Glist located a preliminary 1994 staff order at the FCC's Common Carrier Bureau (PA 90-0003, DA 95-1362) in which the parties were asked to calculate an accumulated deferred tax entry using Accounts 190, 281, 282 and 283, and to narrow the issues in dispute. Again, in order to reduce the number of issues in dispute in this proceeding, Mr. Glist accepted MECo's use of these four accounts and focused the dispute on the FAS 109 adjustment proposed by MECo, for the reasons set forth in his pre-filed testimony.

If the Department utilized the accounts which were utilized in the development of Boston Edison pole attachment rates in *A-R Cable Services*, then the MECo rates proposed by Mr. Glist would change from \$9.08/\$4.54 to \$9.00/\$4.50. If this adjustment were combined with the adjustment described in the response to DTE-CABLE-1, the rates proposed by Mr. Glist would change from \$9.08/\$4.54 to \$9.04/\$4.52.

Date: July 27, 1998

Responsible Witness: Paul Glist

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DOCKET NO. D.T.E. 98-52

RESPONSE OF COMPLAINANTS TO DTE-CABLE1-3

DTE-CABLE1-3      Please refer to Complainants' Exhibit 11 at 2, line items 409.1 Federal and 409.1 Other. Verify the accuracy of these entries and, if necessary, provide a revised amount for normalized tax expense.

RESPONSE:            In the schedules attached to his pre-filed testimony, Mr. Glist corrected the typographical error originally shown for this entry in the Complaint, but it had no effect on the rate.

Date: July 27,1998  
Responsible Witness: Paul Glist



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